

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRIARCH PARTNERS, LLC,

Plaintiff,

-VS-

AXIS INSURANCE COMPANY,

Defendant.

Civil Action No.:
1:16-CV-2277-VEC

**AXIS INSURANCE
COMPANY'S NOTICE OF
MOTION FOR SUMMARY
JUDGMENT AGAINST
PATRIARCH PARTNERS, LLC**

PLEASE TAKE NOTICE that in accordance with the schedule established by the Court, Defendant and Counter-Plaintiff AXIS Insurance Company (“AXIS”) hereby moves, before the Honorable Valerie Caproni, Judge of the United States District Court for the Southern District of New York, at the United States Courthouse located at 40 Foley Square, New York, New York, 10007, for an order (i) pursuant to Fed. R. Civ. P. 56, granting summary judgment in AXIS’s favor with respect to all causes of action in the Amended Complaint in this matter, D.E. 42, as well as in AXIS’s Counterclaim against Plaintiff and Counterclaim-Defendant Patriarch Partners, LLC (“Patriarch”), and (ii) declaring that AXIS has no obligation under its policy or at law to provide coverage for any of Patriarch’s claimed losses associated with the formal investigation by the United States Securities and Exchange Commission, *In the Matter of Patriarch Partners, LLC* (HO-11665), or the related enforcement action, *In the Matter of Lynn Tilton; Patriarch Partners, LLC; Patriarch Partners, VIII, LLC; Patriarch Partners XIV, LLC; and Patriarch Partners XV, LLC*, Administrative Proceeding File No. 3-16462.

This motion is based on the accompanying Statement of Undisputed Material Facts pursuant to Local Civil Rule 56.1, the Declaration of Gabriela Richeimer with exhibits annexed thereto, and the Memorandum of Law in Support of the Motion for Summary Judgment.

Dated: January 24, 2017
New York, NY

TROUTMAN SANDERS LLP

By: s/ Gabriela Richeimer
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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2017, the foregoing document was served in accordance with the Federal Rules of Civil Procedure, by e-mail pursuant to consent, upon the following parties and participants:

TROUTMAN SANDERS LLP

By: _____s/_____